



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

OCT 24 2007

Robert J. Brundage
Newman, Comley & Ruth P.C.
P.O. Box 537
Jefferson City, Missouri 65102-3306

Dear Robert:

Re: City of Bolivar, Missouri – Consent Order
EPA Docket No. CWA-07-2007-0068

We received your October 15, 2007, letter regarding deliverables for the City of Bolivar under the recently entered order for compliance. Berla Johnson and I reviewed the issues raised in your letter, particularly with regard to the data tracking system and data management system, as well as documents presented by the City during our June 8, 2007, meeting in Sedalia.

In your letter, you requested additional comments regarding the City's tracking system and data management system. Our recollection from the meeting was that we indicated to the City that they appeared to be headed in a productive direction for each task. At the time, the City was considering use of a software program for tracking purposes that also has GIS capabilities. The City did not, however, have specific information on the system at the time of our meeting, nor have we received additional information following that meeting. In addition, the City handed out samples of a work order, an SSO report form and a flow chart to process the events. The Environmental Protection Agency (EPA) jotted down a few notes and suggestions on those draft documents and handed them back to the City after a brief discussion.

As stated at the meeting, the goal regarding the data collection and management systems is for the City to implement systems that will provide the City with the information it needs to effectively manage its wastewater program. There is no set standard that EPA has identified that each city must meet. Rather, the needs and available expertise of each city will likely influence the systems chosen. Based on the preliminary information provided by the City, if the system described by the City or a system with a similar level of detail is chosen by the City, it will likely be acceptable to EPA. When the City submits its plan for the Tracking System in November and for the Data Management System in December, the City should include in its submittal information that will enable EPA and the Missouri Department of Natural Resources (MDNR) to understand how the chosen systems will enable the City to acquire and thereafter manage information regarding the collection system, and how the City will utilize that information to achieve and/or improve compliance.

If the City has any specific information regarding the data collection or management systems that it would like EPA and MDNR to review and provide preliminary comments on before the required submittal date, please feel free to provide that information. Otherwise, based on the evaluation of the potential system the City was considering at the time of our June meeting, EPA is confident that the City will select a system that will, first and foremost, meet its own needs, and secondly, fulfill the requirements of the consent order.

Please let me know if you have any further questions regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Patricia Gillispie Miller', with a long horizontal flourish extending to the right.

Patricia Gillispie Miller
Senior Assistant Regional Counsel

cc: Kevin Mohammadi, MDNR
Cindy Davies, MDNR/SWRO